5 UNITED STATES DISTRICT COURT 7 DISTRICT OF NEVADA 8 Case No. 2:17-cv-01868-RFB-NJK 9 IN RE: TAHOE RESOURCES, INC. Order 10 SECURITIES LITIGATION [Docket Nos. 204, 206] 11 12 Pending before the Court is Lead Plaintiff's motion for issuance of letter rogatory to take the deposition of and compel documents from Néstor Melgar. Docket No. 204; see also Docket 14 No. 206 (previously sealed version). The motion is unopposed. See Docket No. 219. The motion is properly resolved without a hearing. See Local Rule 78-1. For the reasons discussed below, the motion is **GRANTED**. 17 T. BACKGROUND 18 This is a securities class action in which Lead Plaintiff alleges false or misleading statements regarding Defendants' mining operations in Central and South America. See Docket 20 No. 59 (consolidated amended complaint). Lead Plaintiff filed several motions seeking issuance of letters rogatory. In the instant motion, Lead Plaintiff seeks a letter rogatory regarding the deposition and documents of Néstor Melgar, who was a parish priest involved in the opposition to

#### II. STANDARDS

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the Escobal mine. See Docket No. 206-2 at 6.

"[A] letter rogatory is the request by a domestic court to a foreign court to take evidence from a certain witness." *Intel Corp. v. Advanced Micro Devices, Inc.*, 542 U.S. 241, 247 n.1 (2004). Private parties in U.S. litigation may seek the issuance of letters rogatory in civil lawsuits. *See in re Premises Located at 840 140th Ave. NE, Bellevue, Wash.*, 634 F.3d 557, 562 (9th Cir.

2011). A deposition may be taken in a foreign country "under a letter of request, whether or not captioned a 'letter rogatory." Fed. R. Civ. P. 28(b)(1)(B). A letter rogatory may also include a request for the production of documents. Viasat, Inc. v. Space Systems/Loral, Inc., 2013 WL 12061801, at \*2 (S.D. Cal. Jan. 14, 2013).

The standards governing such requests have been succinctly stated as follows:

A court has inherent authority to issue letters rogatory. 28 U.S.C. § 1781 also implicitly provides federal courts with authority to issue letters rogatory. Whether to issue such a letter is a matter of discretion for the court. When determining whether to exercise its discretion, a court will generally not weigh the evidence sought from the discovery request nor will it attempt to predict whether that evidence will actually be obtained. A court's decision whether to issue a letter rogatory, though, does require an application of Rule 26(b) in light of the scope of discovery provided for by the Federal Rules of Civil Procedure. "Under Rule 26(b), parties may obtain discovery regarding nonprivileged matter that is relevant to any party's claim or defense."

Dish Network LLC v. Jadoo TV, Inc., 2020 WL 6528425, at \*2 (N.D. Cal. June 29, 2020) (internal citations omitted).

#### III. **ANALYSIS**

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The Court finds that issuance of a letter rogatory is appropriate in this case. Lead Plaintiff has made a showing that Melgar has relevant information in this case. Moreover, Defendants do not oppose the request. Given that Melgar is a non-party located in Guatemala, the letter rogatory 19 is a necessary and appropriate mechanism to request the desired discovery.

#### 20 IV. **CONCLUSION**

Accordingly, the Court GRANTS Lead Plaintiff's motion for issuance of letter rogatory to take the deposition of and compel documents from Néstor Melgar.

IT IS SO ORDERED.

Dated: October 31, 2022

United States Magistrate Judge

# REQUEST FOR SERVICE ABROAD OF JUDICIAL OR EXTRAJUDICIAL DOCUMENTS PURSUANT TO THE ADDITIONAL PROTOCOL TO THE INTER-AMERICAN CONVENTION ON LETTERS ROGATORY

FORM A

#### LETTER ROGATORY 1

1	2
REQUESTING JUDICIAL OR OTHER ADJUDICATORY AUTHORITY	PLAINTIFF: \v. In re Tehoe Resources, Inc. Sec. Lillg. DEFENDANT;
Name United States District Court for the District of Nevada  Address Line 1: 333 Las Vegas Blvd, South Address Line 2: Room 3005 Address Line 3: Las Vegas, Nevada 89101 Address Line 4: USA	DOCKET No: 2:17-cv-01868
3	4
CENTRAL AUTHORITY OF THE STATE OF ORIGIN	CENTRAL AUTHORITY OF THE STATE OF DESTINATION
Name: United States Department of Justice's Office of International Judicial Assistance	Name: Corte Suprema de Justicia
Address Line 1: ABC Legal Services Address Line 2: 633 Yesler Way Address Line 3: Seattle, WA 98104 Address Line 4: USA	Address Line 1: 21 calle 7-70 zona 1, Centro Civico Address Line 2: Edificio Palacio de Justicia Address Line 3: Guatemala Cily Address Line 4: Guatemala
5	6
REQUESTING PARTY  Tiffany Huynh, as executor for the estate of Name: Kevin Nguyen  Address Line 1: c/o James M. Wilson, Jr., Esq. Address Line 2: Faruqi & Faruqi, LLP Address Line 3: 685 Third Avenue, 26th Floor Address Line 4: New York, NY 10017 USA	COUNSEL TO THE REQUESTING PARTY  Name: James M. Wilson, Jr., Esq.  Address Line 1: Faruqi & Faruqi, LLP  Address Line 2: 685 Third Avenue, 26th Floor  Address Line 3: New York, NY 10017  Address Line 4: USA
PERSON DESIGNATED TO ACT IN CONNECTI	
Name:	Is this person responsible for costs and

James M. Wilson, Jr., Esq.

Address Line 4: USA

Address Line 1: Faruqi & Faruqi, LLP

Address Line 2: 685 Third Avenue, 26th Floor Address Line 3: New York, NY 10017

expenses?

is attached.

No 🗌

If not, check in the amount of \$

(Or proof of payment is attached.)

Yes 🔽

<sup>&</sup>lt;sup>1</sup> Complete the original and two copies of this form; if A (1) is applicable, attach the original and two copies of the translation of this item in the language of the State of destination.

The Central Authority signing the letter rogatory has the honorto transmit to you in triplicate the documents listed below and, in conformity with the protocol to the Inter-American Convention on Letters Rogatory:

*	A.	Requests their prompt service on:  Father Nestor Adolfo Melgar Monterroso
		San Jose Pinula, Guatemala
The	e und	ersigned authority requests the service be carried out in the following manner:
	descr	n accordance with the special procedure or additional formalities that are ribed below, as provided for in the second paragraph of Article 10 of the above ioned Convention; or
*		By service personally on the identified addressee or, in the case of a legal cy, on its authorized agent; or
*		f the person or the authorized agent of the entity to be served is not found, ice shall be made in accordance with the law of the State of destination.
		uests the delivery of the documents listed below to the following judicial or ive authority:
	Auth	ority:
Autho this le	ority o	quests the Central Authority of the State of destination to return to the Central of the State of origin one copy of the documents listed below and attached to ogatory, and an executed Certificate of the attached Form C.
Done	at <u>La</u>	s Vegas, Nevada this 31 date of October, 2022
judicial	l or oth	Signature and stamp of the ner adjudicatory Central Authority of the State of origin State of origin
Form Spanis transla	A in sh; Fo ated in sh; an	identification of each document to be delivered: English and translated into Spanish; Form B in English and translated into orm C in English and translated into Spanish; Schedule A in English and nto Spanish; Subpoena to Testify at a Deposition in English and translated into Consolidated Amended Class Action Complaint in English and translated into the consolidated Amended Class Action Complaint in English and translated into the consolidated Amended Class Action Complaint in English and translated into the consolidated Amended Class Action Complaint in English and translated into the consolidated Amended Class Action Complaint in English and translated into the consolidated Amended Class Action Complaint in English and translated into the consolidated Amended Class Action Complaint in English and translated into the consolidated Amended Class Action Complaint in English and translated into the consolidated Amended Class Action Complaint in English and translated into the consolidated Amended Class Action Complaint in English and translated into the consolidated Amended Class Action Complaint in English and translated into the consolidated Amended Class Action Complaint in English and translated into the consolidated Amended Class Action Complaint in English and translated into the consolidated Amended Class Action Complaint in English and translated into the consolidated Amended Class Action Complaint in English and translated into the consolidated Amended Class Action Complaint in English and translated into the consolidated Amended Class Action Complaint in English and translated into the consolidated Amended Class Action Complaint in English and translated into the consolidated Amended Class Action Complaint in English and translated into the consolidated Amended Class Action Complaint in English and translated into the consolidated Amended Class Action Complaint in English and translated into the consolidated Amended Class Action Complaint into the consolidated Class Action Complaint in English and transla

<sup>(</sup>Attach additional pages, if necessary)

<sup>\*</sup>Delete if inapplicable

### ANNEX TO THE ADITIONAL PROTOCOL TO THE INTER-AMERICAN CONVENTION OF LETTERS RAGOTORY

FORM B ESSENTIAL INFORMATION FOR THE ADDRESSEE <sup>1</sup>

To (Name and address of the person being served) <u>Father Nestor Adolfo Melgar Monterroso</u> San Jose Pinula, Guatemala

You are hereby informed that (Brief statement of nature of service) You are being compelled to appear for a non-party deposition and to produce documents in connection with In re Tahoe Resources, Inc. Sec. Litig., case no. 2:17-cv-01868-RFB- NJK

A copy of the letter rogatory that gives rise to the service or delivery of these documents is attached to this document. This copy also contains essential information for you. Also attached are copies of the complaint or pleading initiating the action in which the letter rogatory was issued, of the documents attached to the complaint or pleading, and of any rulings that ordered the issuance of the letter rogatory.

### ADDITIONAL INFORMATION I\*

#### FOR SERVICE

A.	The document being served on you (original or copy) concerns the following:
	Lead Plaintiff is compelling you to appear for a non-party deposition and to
	produce documents in connection with this case.

В.	The remedies sought or the amount in dispute is as follows:
	Lead Plaintiff is seeking, against named Defendants only, civil damages and other relief,
	in an amount to be determined, in connection with Defendants' alleged securities law violations

C.	By this service, you are requested:
	To appear, either in-person or virtually, for a non-party deposition and to produce
	documents in connection with this case.
D.	* In case of service on you as a defendant you an answer the complaint before

place, date and hour):	
1 /	

<sup>&</sup>lt;sup>1</sup> Complete the original and two copies of this form in the language of the State of origin and two copies in the language of the State of destination.

<sup>\*</sup> Delete if applicable.

	If you fail to comply, the consequences might be: You may be held in contempourt.
	You are hereby informed that a defense counsel appointed by the Court or the Following legal aid societies are available to you at the place where the proceeding is pending.
	Name: Nevada Legal Services
	Address: _530 6th St., Las Vegas, Nevada 89101 USA
	The documents listed in Part III are being furnished to you so that you may bunderstand and defend your interests.
	II * FOR INFORMATION FROM JUDICIAL OR ADMINISTRATIVE AUTHORITY
_	(Name and address of the judicial or administrative authority)
	You are respectfully requested to furnish the undersigned authority with the following information.
_	
	The documents listed in Part III are being furnished to you to facilitate your reply.

# III LIST OF ATTACHED DOCUMENTS

Subpoena to Testify at a Deposition and I		
Spanish; Schedule A to the subpoena, in		
Consolidated Amended Class Action Con	upianu, in english and translated mi	o spanisii.
(Attach add	litional pages if necessary)	
(Attach ade	intional pages if necessary)	
Done at Las Vegas, Nevada	this 3	day of
Las vegas, Nevaua	tills	day or
	20	
UGObo!	, 20 _22	
Signature and stamp/of the	Signature and stamp of	,
judicial or other adjudicatory	the Central Authority	
authority of the State of origin	of the State of Origin	

#### ANNEX TO THE ADDITIONAL PROTOCOL TO THE INTER-AMERICAN CONVENTION ON LETTERS ROGATORY

FORM C

333 Las V	CERTIFICATE OF EXECUTION 1  Nacy S. Koppl  rable Richard F. Boulware, H; United States District Court for the District of Nevada as Vegas Blvd. South, Room 3005 (egas, Nevada 98101, USA ne and address of judicial or other adjudicatory authority that issued the letter rogatory)
In con Letters Ro	formity with the Additional Protocol to the Inter-American Convention on gatory, signed at Montevideo on May 8, 1979, and in accordance with the riginal letter rogatory, the undersigned Central Authority has the honor to certify
* A.	That one copy of the documents attached to this Certificate has been served or delivered as follows:
Dat	e:
At (	(Address)
By one	of the following methods authorized by the Convention.
(	In accordance with the special procedure or additional formalities that are described below, as provided for in the second paragraph of Article 10 of the above mentioned Convention, or
* (2)	By service personally on the identified addressee or, in the case of a legal entity, on its authorized agent, or
* (3)	If the person or the authorized agent of the entity to be served was not found, in accordance with the law of the State of destination; (Specify method used)

<sup>&</sup>lt;sup>1</sup> Complete the original and one copy in the language of the State of destination. \*Delete if inapplicable

	B. That the documents re	eferred to in the l	etter rogatory h	ave been delivered to:
	Identity of person			
	Relationship to the addre			(Family,business or other)
*	C. That the documents delivered for the fol	attached to the Clowing reason(s)	Certificate have 1 :	not been served or
*	D In conformity with th rogatory is requested to indicated in the attach	e Protocol, the pato pay the outsta	arty requesting	execution of the letter
Do	one at	the	day of	20
	(Signature and s	tamp of Central Aut	hority of the State	of destination)
of	here appropriate, attach origina any additional documents prov delivery, and identify them			
*[	Delete if inapplicable			

### SOLICITUD DE NOTIFICACIÓN O TRASLADO EN EL EXTRANJERO DE DOCUMENTOS JUDICIALES O EXTRAJUDICIALES EN VIRTUD DEL PROTOCOLO ADICIONAL A LA CONVENCIÓN INTERAMERICANA SOBRE COMISIONES ROGATORIAS

#### FORMULARIO A

#### COMISIÓN ROGATORIA 1

SOLICITAR A LA AUTORIDAD JUDICIAL O A OTRA AUTORIDAD ADJUDICADORA

Nombre: Corte de Distrito de los Estados Unidos para el Distrito de Nevada

Dirección Línea 1: 333 Las Vegas Blvd. South

Dirección Línea 2: Room 3005

Dirección Línea 3: Las Vegas, Nevada 89101

Dirección Línea 4: EUA

DEMANDANTE: In re Tahoe Resources Inc. Sec. Litig.

\( \text{V}, \)
DEMANDADO;

EXPEDIENTE Nr.:

2:17-cv-01868

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AUTORIDAD CENTRAL DEL ESTADO DE ORIGEN

Nombre: Oficina de Asistencia Judicial Internacional del Departamento de Justicia de los Estados Unidos

Dirección Línea 1: ABC Legal Services Dirección Línea 2: 633 Yesler Way Dirección Línea 3: Seattle, WA 98104

Dirección Línea 4: EUA

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AUTORIDAD CENTRAL DEL ESTADO DE DESTINO

Nombre: Corte Suprema de Justicia

Dirección Línea 1: 21 Calle 7-70 zona 1, Centro Cívico

Dirección Línea 2: Edificio Palacio de Justicia Dirección Línea 3: Ciudad de Guatemala

Dirección Línea 4: Guatemala

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PARTE SOLICITANTE

Nombre: Tiffany Huynh, como albacea del patrimonio de Kevin Nguyen

Dirección Línea 1: do James M. Wilson, Jr., Esq. Dirección Línea 2: Faruqi & Faruqi, LLP Dirección Línea 3: 685 Third Avenue, 26th Floor Dirección Línea 4: Nueva York, NY 10017 EUA 6

ABOGADO DE LA PARTE SOLICITANTE

Nombre: James M. Wilson, Jr., Esq.

Dirección Línea 1: Faruqi & Faruqi, LLP Dirección Línea 2: 685 Third Avenue, 26th Floor Dirección Línea 3: Nueva York, NY 10017

Dirección Línea 4: EUA

PERSONA DESIGNADA PARA ACTUAR EN RELACIÓN CON LA COMISIÓN ROGATORIA

Nombre:

James M. Wilson, Jr., Esq.

Dirección Línea 1: Faruqi & Faruqi, LLP

Dirección Línea 2: 685 Third Avenue, 26th Floor

Dirección Línea 3: Nueva York, NY 10017

Dirección Línea 4: EUA

¿Esta persona es responsable de los costos y gastos?

Sí 🗹 No 🗌

En caso negativo, verifique el monto en \$ se adjunta.

(O se adjunta el comprobante de pago).

<sup>1</sup> Llene el original y dos copias de este formulario; si A (1) es aplicable, adjunte el original y dos copias de la traducción de este punto en la lengua del Estado de destino.

La Autoridad Central que firma la comisión rogatoria tiene el honor de remitirle por triplicado los documentos que se indican a continuación y, de conformidad con el protocolo de la Convención Interamericana sobre Exhortos o Comisiones Rogatorias:

*	A.	Solicita su rápido servicio en: Padre Néstor Adolfo Melgar Monterroso
		San José Pinula, Guatemala
La	auto	ridad que suscribe solicita que el servicio se lleve a cabo de la siguiente manera
*	desc	De acuerdo con el procedimiento especial o las formalidades adicionales que se riben a continuación, según lo previsto en el segundo párrafo del artículo 10 itado Convenio; o
*	` '	Mediante notificación personal al destinatario identificado o, en el caso ma persona jurídica, a su agente autorizado; o
*	` '	Si no se encuentra la persona o el agente autorizado de la entidad a notificar, otificación se realizará de acuerdo con la ley del Estado de destino.
		icita la entrega de los documentos que se enumeran a continuación a los- órganos judiciales o autoridad administrativa:
	Auto	oridad:
Autor contir	idad waci	icita a la Autoridad Central del Estado de destino que devuelva a la Central del Estado de origen una copia de los documentos que se enumeran a ón y que se adjuntan a la presente comisión rogatoria, así como un ejecutado del formulario C adjunto.
Realiz	zado,	en Las Vegas, Nevada el día 31 de October de 20 22
Firma ; la parte autorid	judic	Firma y sello de ial vetra adjudicataria Autoridad Central de Estado de origen Estado de origen
Formespañ españ traduc	ulario ol; el cido a	identificación de cada documento a entregar:  A en inglés y traducido al español; Formulario B en inglés y traducido al formulario C en inglés y traducido al español; el programa A en inglés y el español; la citación para testificar en una declaración en inglés y traducida al la demanda colectiva modificada consolidada en inglés y traducida al español.

#### ANEXO AL PROTOCOLO ADICIONAL A LA CONVENCIÓN INTERAMERICANA DE LAS COMISIONES RAGOTORY

## FORMULARIO B INFORMACIÓN ESENCIAL PARA EL DESTINATARIO <sup>1</sup>

Para (Nombre y dirección de la persona notificada) <u>Padre Néstor Adolfo Melgar Monterroso</u> San José Pinula, Guatemala

Por la presente se le informa de que (Breve declaración de la naturaleza del servicio) <u>Se le informa sobre su obligación de comparecer a una declaración sin ser parte y a presentar documentos en conexión con In re Tahoe Resources, Inc. Sec. Litig., caso no. 2:17-cv-01868-RFB- NJK</u>

Se adjunta a este documento una copia de la comisión rogatoria que da lugar a la notificación o entrega de estos documentos. Este ejemplar también contiene información esencial para usted. También se adjuntan copias de la demanda o del escrito en el que se inició la comisión rogatoria, de los documentos adjuntos a la demanda o al escrito y de las resoluciones que ordenaron la expedición de la comisión rogatoria.

### INFORMACIÓN ADICIONAL

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#### PARA NOTIFICACIÓN

- A. El documento que se le notifica (original o copia) se refiere a lo siguiente: El Demandante Principal le obliga a comparecer para una deposición de no parte y a presentar documentos en relación con este caso.
- B. Los recursos solicitados o el importe en litigio son los siguientes:

  El Demandante Principal solicita, únicamente contra los demandados nombrados, una indemnización por daños y perjuicios y otras compensaciones, en una cantidad a determinar, en relación con las supuestas violaciones de la ley de valores por parte de los Demandados.
- C. Mediante este servicio, se le solicita:

  Comparecer, ya sea en persona o virtualmente, para una declaración de no parte y

  presentar documentos en relación con este caso.
- D. \*En caso de que se le notifique como demandado, deberá responder a la demanda ante la autoridad judicial u otra autoridad adjudicadora especificada en el formulario A, casilla 1 (Estado, lugar, fecha y hora):
  - \* Se le convoca para que comparezca como: No aplicable.

<sup>&</sup>lt;sup>1</sup> Llene el original y dos copias de este formulario en la lengua del Estado de origen y dos copias en la lengua del Estado de destino.

<sup>\*</sup> Borre si procede.

	Si no cumple, las consecuencias pueden ser: Puede ser declarado en desacato al tribunal.
•	Se le informa de que en el lugar donde se tramita el procedimiento se encuentra a su disposición un abogado defensor designado por el Tribunal o las siguientes sociedades de asistencia jurídica.
	Nombre: Nevada Legal Services
Ι	Dirección: 530 6th St., Las Vegas, Nevada 89101 EUA
	Los documentos enumerados en la Parte III se le facilitan para que pueda compre defender mejor sus intereses.  II *  PARA INFORMACIÓN DE LA AUTORIDAD JUDICIAL O ADMINISTRATIVA
ra:	
-	(Nombre y dirección de la autoridad judicial o administrativa)
	Se ruega que facilite a la autoridad que suscribe la siguiente información.

#### III RELACIÓN DE DOCUMENTOS ADJUNTOS

iva_
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—

#### ANEXO AL PROTOCOLO ADICIONAL A LA CONVENCIÓN INTERAMERICANA SOBRE COMISIONES **ROGATORIAS**

FORMULARIO C

#### CERTIFICADO DE EJECUCIÓN 1

Para: Honor:	Nancy J. Kope able <del>Richard F. Boulware, H</del> , Tribunal de Distrito de los Estados Unidos para el Distrito de Nevada
333 La	s Vegas Blvd. South, Room 3005
Las Ve	gas, Nevada 98101, EUA
(Non	ibre y dirección de la autoridad judicial u otra autoridad adjudicadora que emitió la comisión rogatoria)
De cor	nformidad con el Protocolo Adicional a la Convención Interamericana sobre
Exhortos o	Comisiones Rogatorias, firmado en Montevideo el 8 de mayo de 1979, y de
acuerdo co	n el exhorto o comisión rogatoria original adjunta, la Autoridad Central que
	ene el honor de certificar lo siguiente:
* A. (	Que una copia de los documentos adjuntos a este certificado ha sido notificada o entregada como sigue:
Fecl	na:
En (	dirección)
·	
Por uno	de los siguientes métodos autorizados por el Convenio.
* (1) D	e acuerdo con el procedimiento especial o las formalidades adicionales
	ue se describen a continuación, según lo previsto en el segundo párrafo
	el artículo 10 de dicho Convenio, o
-	
* (Q)	
* (2)	Mediante notificación personal al destinatario identificado o, en el caso
	de una persona jurídica, a su agente autorizado, o
* (3)	Si no se encontró a la persona o al agente autorizado de la entidad a
. ,	notificar, de acuerdo con la ley del Estado de destino; (especifique el método utilizado)

<sup>&</sup>lt;sup>1</sup> Llene el original y una copia en la lengua del Estado de destino. \*Borrar si no se puede aplicar

Identidad de la per	sona				
Relación con el de	stinatario		(Familia, negocio		
* C. Que los documentos adjuntos al certificado no han sido notificados o entregados por el siguiente motivo(s):					
de la comisión re	con el Protocolo, se pio ogatoria que pague el s a en la declaración adj	aldo pendiento			
Hecho en	el día	de		_de 20_	
(Firm	a y sello de la Autoridad Co	entral del Estado	de destino)		
En su caso, adjunte los or de los documentos adicion a notificación o entrega, e	ales que acrediten				
*Borrar si no se puede apli					



GTS Translation 4747 Collins Ave.

Miami Beach FL 33140 USA

(866) 280-9038 sales@gts-translation.com

#### CERTIFICATION OF TRANSLATION ACCURACY

Date: 2022-09-16

#### **Document Names:**

USM-272-frm (abclegal) (Forms A-C), Guillermo Monroy) (9.14.22),

USM-272-frm (abclegal) (Forms A-C) (Gustavo Herrarte) (9.14.22),

USM-272-frm (abclegal) (Forms A-C) (Juan Jose Cabrera) (9.14.22),

USM-272-frm (abclegal) (Forms A-C) (Kelvin Villalta) (9.14.22),

USM-272-frm (abclegal) (Forms A-C) (Nestor Melgar) (9.14.22),

USM-272-frm (abclegal) Forms A-C (Javier Fortin) (9.14.22)

Source Language: English
Target Languages: Spanish

GTS Translation, a professional translation company, hereby declares that the above-mentioned documents have been translated and reviewed and are true translations of the original documents to the best of our knowledge.

All translation and review work has been done by professional translators who are native in the target language, and that have the necessary subject matter expertise in the relevant field as applicable.

A copy of the translations must be attached to this certificate.

David J. Grunwald

Grunualy

Account Manager

GTS Translation